

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN
GREEN BAY DIVISION**

CONVERGEN ENERGY WI LLC and THEODORE
HANSEN,

Plaintiffs,

-against-

CONVERGEN ENERGY LLC, L'ANSE WARDEN
ELECTRIC COMPANY, LLC, and LIBRA CAPITAL
US, INC.,

Defendants.

Index No.

**Brown County Circuit Court,
Wisconsin, Case No. 2020-CV-000495**

DECLARATION OF MICHAEL STOLPER

I, Michael Stolper, declare:

1. My name is Michael Stolper and I am an attorney with the Seiden Law Group LLP. I am licensed to practice in the State of New York, and I submit this declaration in support of the Notice of Removal. If I were asked to testify, I would testify consistent with this declaration, and I have personal knowledge of all facts set forth herein.

2. I am counsel to Defendants Convergen Energy LLC ("CE"), L'Anse Warden Electric Company, LLC ("Lanse"), and Libra Capital US, Inc. ("Libra").

3. Libra is a Delaware Corporation with a principal place of business in New York.

4. Lanse is a Delaware limited liability company and wholly owned subsidiary of CE.

5. CE is a Delaware limited liability company and wholly owned subsidiary of Convergen Energy Holdings LLC, a Delaware limited liability company.

6. Convergen Energy Holdings LLC is a wholly owned subsidiary of First North American Holdings II, Inc., a Delaware corporation.

7. Upon information and belief, CE-Wisconsin and Niantic are not citizens of Delaware or New York.

8. I have requested Plaintiffs' counsel Benjamin LaFrombois to identify the members of Convergen Energy WI, LLC and NianticVista Energy, LLC but have not received an answer.

Dated this 2nd day of June, 2020.

Electronically signed by Michael Stolper

Michael Stolper